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Sent: Tuesday, June 30, 2015 11:23 AM
To: Cozzy, Robert (DEC); O'Connell, Jane H (DEC); Deming, Justin (HEALTH); Stephanie L Selmer (stephanie.selmer@health.ny.gov)
Cc: Rotola, Joe; wilson.ericj@epa.gov
Subject: Update - Columbia Smelting and Refining Works Site/Red Hook Park, Brooklyn

Good morning,

EPA held a conference call with NYC Parks and Health yesterday (June 29th) in which Parks responded to EPA's recommendations from the April 2015 sampling. To summarize the call, the recommendations and responses were as follows.

Ball Fields 5, 6, 7, 8 and 9

Based on the presence of contaminants in the upper 12" of Ball Fields 5 through 9 which can be attributed to the historic Columbia facility, EPA requires a 12" barrier of clean soil with a demarcation layer over these fields to be included with the Columbia removal action, as well as placing an environmental easement over these areas for long-term maintenance and monitoring under NYSDEC oversight. NYC Parks indicated they will perform this work under an Administrative Order on Consent (AOC) with EPA. As previously discussed, NYC Parks plans to cap these areas to meet the 12" barrier of clean soil, based on the expectation that this alternative will take considerably less time and cost less than excavation and backfilling. EPA accepts this as an appropriate response action, as it provides sufficient risk reduction to park users. Since samples collected in April from the upper 6" of soil on Ball Field 9 did not contain any contaminants above the applicable EPA Removal Management Levels (RMLs), the 12" barrier can include the existing upper 6" of soil on Ball Field 9, with a demarcation layer on top of the existing soil. In addition, Parks requested that they be allowed to stagger the removal action to reduce disruption to park users, by first addressing Ball Fields 5 through 8, and addressing Ball Field 9 once Ball Fields 5 through 8 are back in service. Based on the low risk of exposure to elevated contaminant levels at Ball Field 9 in the short term, this approach is acceptable to EPA. EPA has begun drafting the AOC for the removal action. NYC Parks plans to have a time estimate for the work ready by July 10, 2015.

Soccer Fields 1, 2 and 6

Contaminants at concentrations above the applicable EPA RMLs were found at all depths on these fields, but are not linked to the historic Columbia facility. EPA recommended that NYC Parks provide a 12" barrier of clean soil over all three fields and the surrounding areas, with enhanced maintenance and monitoring in the short term to increase and maintain the grass cover until the 12" barrier can be installed. NYC Parks indicated that they and NYC Health are evaluating appropriate maintenance procedures for the short term and are looking for funding source(s) for the long term actions. The cleanup will likely include some level of capping and installation of synthetic turf over the fields. NYC Parks plans to conduct this project without direct EPA oversight, but agreed to keep EPA informed of all plans.

Long-term controls to ensure the protectiveness of the remedy for these three fields were not discussed. Please let us know if NYSDEC could require an environmental easement or other form of institutional control for these fields to ensure regulatory oversight of the long-term maintenance and monitoring.

Additional Investigation in Red Hook Park

Based on the known presence of contaminated historic fill within the park (specifically at Soccer Fields 1, 2 and 6), EPA recommended that NYC Parks sample the remaining areas of Red Hook Park, including Soccer Field 3, Ball Fields 1, 2, 3 and 4, and the surrounding areas. NYC Parks agreed to conduct additional investigation and plans to carry out the sampling in conjunction with NYC Health. The methodology for the sampling and analysis will likely differ from that used by EPA, including the sampling depth intervals and the list of analyses. This sampling is expected to start in September.

Public Involvement

The second public meeting is tentatively planned for the week of July 20th. EPA will present a summary of the April sampling data, the recommendations made to NYC Parks and an update on interim measures and the removal action planning as outlined above, including time frames. EPA will be drafting a fact sheet with an update and an announcement of the public meeting, to be included in a letter from NYC Parks to park users and for distribution to elected officials and the general public. I'll send the finalized fact sheet to you by the end of next week.

We'll keep you posted with any more developments, and feel free to get in touch with any questions.

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